

ESTTA Tracking number: **ESTTA682342**

Filing date: **07/08/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91197089
Party	Plaintiff Los Angeles Dodgers, LLC
Correspondence Address	DON M OBERT COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6799 UNITED STATES sis@cll.com, trademark@cll.com, jmn@cll.com, mlk@cll.com, dmo@cll.com, rsm@cll.com
Submission	Other Motions/Papers
Filer's Name	Lindsay M. Rodman
Filer's e-mail	trademark@cll.com, jmn@cll.com, lmr@cll.com
Signature	/Lindsay Rodman/
Date	07/08/2015
Attachments	BROOKLYN BURGER Motion to Suspend 7,8,15.pdf(99264 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/750,645  
Filed: June 3, 2009  
For Mark: BROOKLYN BURGER (Stylized)  
Published in the Official Gazette: April 27, 2010

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LOS ANGELES DODGERS, LLC,	:
	:
Opposer,	:
	:
v.	:
	:
	Opposition No. 91197089
	:
A. STEIN MEAT PRODUCTS, INC.,	:
	:
Applicant.	:
	:
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**MOTION ON CONSENT TO SUSPEND AND TO EXTEND  
DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, with the consent of Applicant's counsel, hereby requests that the Deadline for Initial Disclosures and all remaining dates be suspended for sixty (60) days as follows to discuss settlement:

<b>Initial Disclosures Due:</b>	9/15/2015
<b>Expert Disclosures Due :</b>	1/13/2016
<b>Discovery Period to Close :</b>	2/12/2016
<b>Plaintiff Pretrial Disclosures :</b>	3/29/2016
<b>Plaintiff's 30-day Trial Period Ends :</b>	5/12/2016
<b>Defendant/Counterclaim Plaintiff's Pretrial Disclosures :</b>	5/27/2016
<b>30-day Trial Period for Defendant and Plaintiff in the Counterclaim :</b>	7/11/2016

<b>Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :</b>	7/26/2016
<b>30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:</b>	9/9/2016
<b>Counterclaim Plaintiff's Rebuttal Disclosures Due:</b>	9/24/2016
<b>15-day Rebuttal Period for Counterclaim Plaintiff Ends :</b>	10/24/2016
<b>Plaintiff's Trial Brief Due :</b>	12/23/2016
<b>Defendant's Trial Brief and Plaintiff in the Counterclaim Due :</b>	1/22/2017
<b>Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due :</b>	2/21/2017
<b>Reply Brief, if any, for Plaintiff in the Counterclaim Due :</b>	3/8/2017

If the Board grants this motion, the Board should reset the trial periods and other periods as outlined above.

Dated: New York, New York  
July 8, 2015

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.  
*Attorneys for Opposer*

By: /Lindsay Rodman/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on July 8, 2015, I caused a true and correct copy of the foregoing Motion On Consent To Suspend And To Extend Discovery Period If Opposition Is Resumed to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Robert T. Maldonado, Esq., Cooper & Dunham LLP, 30 Rockefeller Plaza, New York, New York 10012.

New York, New York  
Dated: May 11, 2015

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/Lindsay Rodman/  
Lindsay M. Rodman